

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Katherine Bradacs and Tracie Goodwin,)	Civil Action No. 3:13-cv-02351-JFA
)	
Plaintiffs,)	
)	
v.)	RESPONSE OF
)	GOVERNOR AND ATTORNEY
Nimrata (“Nikki”) Randhawa Haley, in her)	GENERAL TO LOCAL RULE
official capacity as Governor of South)	26.01 INTERROGATORIES
Carolina; Alan M. Wilson, in his official)	
Capacity as Attorney General,)	
)	
Defendants.)	
_____)	

Subject to their right to Move to Dismiss or Answer the Complaint herein, the Defendants Governor and Attorney General, hereby submit these responses to the Local Civil Rule 26.01, DSC, Interrogatories:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: None

(B) As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: The Defendants reserve the right to move to dismiss this case or otherwise move for summary disposition of this suit. If, *arguendo*, it is tried, it should be non-jury because the issues involve primarily questions of law.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding

shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: The Defendants are not publically owned companies.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civil Rule 3.01.

RESPONSE: Inapplicable as to these Defendants.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. . . .

RESPONSE: No.

(F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Not applicable

(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: Not applicable.

[Signature block on next page]

Respectfully submitted,

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September 12, 2013

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